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HALPERN FINANCIAL, INC.

PRIVACY NOTICE

Halpern Financial, Inc. (referred to as "Halpern") maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information ("information"). Through this policy and its underlying procedures, Halpern attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of Halpern to restrict access to all current and former clients' information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client's engagement of Halpern. In that regard, Halpern may disclose the client's information: (1) to individuals and/or entities not affiliated with Halpern, including, but not limited to the client's other professional advisors and/or certain service providers that may be recommended or engaged by Halpern in furtherance of the client's engagement of Halpern (i.e., attorney, accountant, insurance agent, brokerdealer, investment adviser, account custodian, record keeper, proxy management service provider, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by Halpern to facilitate the commencement/continuation/termination of a business relationship between the client and/or between Halpern and a nonaffiliated third party service provider (i.e., brokerdealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of Halpern (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

Halpern permits only authorized employees and affiliates who have signed a copy of Halpern's Privacy Policy to have access to client information. Employees violating Halpern's Privacy Policy will be subject to Halpern's disciplinary process. Additionally, whenever Halpern hires other organizations to provide services to Halpern's clients, Halpern will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact Melissa Sotudeh, Chief Compliance Officer.